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9 *Company, Disney Media and Entertainment*
10 *Distribution LLC, Disney DTC LLC, Disney*
11 *Streaming Services LLC, Disney Entertainment &*
12 *Sports LLC, Disney Platform Distribution, Inc.,*
13 *BAMTech LLC, Hulu, LLC, and ESPN, Inc.*

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**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION AT LOS ANGELES**

INTERDIGITAL INC.,
INTERDIGITAL VC HOLDINGS,
INC., INTERDIGITAL MADISON
PATENT HOLDINGS, SAS, AND
INTERDIGITAL CE PATENT
HOLDINGS, SAS,

Plaintiffs and
Counterclaim-
Defendants,

v.

THE WALT DISNEY COMPANY,
DISNEY MEDIA AND
ENTERTAINMENT DISTRIBUTION
LLC, DISNEY DTC LLC, DISNEY
STREAMING SERVICES LLC,
DISNEY ENTERTAINMENT &
SPORTS LLC, DISNEY PLATFORM
DISTRIBUTION, INC., BAMTECH,
LLC, HULU, LLC, AND ESPN, INC.,

Defendants and
Counterclaim-
Plaintiffs.

Case No. 2:25-cv-895-WLH-BFM

**DEFENDANTS'
EVIDENTIARY OBJECTION
TO PLAINTIFFS' NOTICE OF
SUPPLEMENTAL
AUTHORITY**

Judge: Hon. Wesley L. Hsu
Magistrate: Hon. Brianna F. Mircheff
Hearing: May 30, 2025 at 1:30 pm
Courtroom 9B

1 On Friday, March 23, 2025, Plaintiffs filed a Notice of Supplemental
2 Authority (ECF No. 71) attaching an Anti-Foreign Interference-Injunction order
3 from the Munich Regional Court I, Ref. 7 O 6397/25 that has no bearing on these
4 proceedings. Plaintiffs have not received any similar such order from the court in
5 Brazil and, therefore, Defendants object to the inclusion of the irrelevant material.

6 The supplemental authority does not address any factual or legal issue
7 presented in this forum. Defendants have not requested that this Court prohibit
8 Plaintiffs from enforcing decisions that may arise from the patent infringement
9 proceedings going on before the national courts in Germany. The German national
10 courts have a well-established legal history of prohibiting foreign anti-suit
11 injunctions. See, e.g., OLG Düsseldorf BeckRS 1996, 940. Defendants made clear
12 to Plaintiffs' counsel that they will follow all applicable rules, policies, contractual
13 obligations, and legal precedent around the globe thus there was no need for
14 Plaintiffs to request such an order from the Munich Regional Court in a *newly filed*
15 *case* that Defendants were not even made aware of before Plaintiffs' filing (ECF
16 No. 71) on Friday, May 23, 2025.

17 Defendants are unaware of any rule, policy, contractual obligation, or legal
18 precedent prohibiting the requested remedy before this Court that InterDigital be
19 preliminarily enjoined from enforcing any injunction awarded in Brazil while the
20 RAND counterclaims are pending nor have Plaintiffs provided any such applicable
21 authority. Therefore, the Court should sustain the objection and disregard the
22 Supplemental Authority (ECF No. 71-1).

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DATED: May 27, 2025

Respectfully submitted,

By: /s/ Ryan K. Yagura
Ryan K. Yagura

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